

2
3
4
5
6
7 UNITED STATES DISTRICT COURT
8 WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

9 MASS ENGINEERED DESIGN, INC.,

10 Plaintiff,

11 v.

12 ATDEC DISTRIBUTION USA PTY.
13 LIMITED,

14 Defendant.

No. 2:19-cv-00677-BJR

**SECOND STIPULATED MOTION AND
ORDER GRANTING EXTENSION OF
TIME FOR DEFENDANT ATDEC
DISTRIBUTION USA PTY. LIMITED
TO ANSWER OR RESPOND TO
PLAINTIFF'S COMPLAINT**

NOTE ON MOTION CALENDAR:
JUNE 28, 2019

15 Plaintiff Mass Engineered Design, Inc. and Defendant Atdec Distribution USA PTY
16 Limited ("Atdec"), by and through their counsel of record, hereby stipulate as follows:

17 1. Plaintiff filed its Complaint on May 6, 2019 and served Atdec on May 13, 2019.

18 2. On June 3, 2019, the parties filed a joint stipulated motion and proposed order
19 requesting a 30-day extension of Atdec's deadline to answer or otherwise respond to Plaintiff's
20 Complaint.

21 3. Atdec requested the extension to allow the parties an opportunity to pursue
22 settlement discussions prior to beginning to incur the costs of litigation. Plaintiff did not oppose
23 the extension

24 4. On June 4, 2019, this Court entered an Order granting that request and extending
25 Atdec's deadline to answer or otherwise respond to Plaintiff's Complaint to July 3, 2019.
26

5. Since June 3, the parties have continued to engage in settlement discussions and continue to make progress toward resolving this matter. Atdec requests an additional 14-day extension of its deadline to answer or otherwise respond to the Complaint to allow the parties additional time to pursue settlement discussions prior to beginning to incur the costs of litigation. Plaintiff does not oppose the extension.

6. By agreement of counsel, Atdec shall have a 14-day extension, until July 17, 2019, to timely answer or otherwise respond to Plaintiff's Complaint.

SO STIPULATED this 28th day of June, 2019.

EDMONDS & SCHLATHER, PLLC

STOEL RIVES LLP

/s/ Nicholas Ranallo

Nicholas Ranallo, WSBA No. 51439
5058 57th Ave. South
Seattle, WA 98118
P: (831) 607-9229
F: (831) 533-5073
nick@ranallolawoffice.com

/s/ Jenna M. Poligo

Jenna M. Poligo, WSBA No. 54466
STOEL RIVES LLP
600 University Street, Suite 3600
Seattle, WA 98101
Telephone: 206.624.0900
Facsimile: 206.386.7500
Email: jenna.poligo@stoel.com

John J. Edmonds (admitted pro hac vice)
jedmonds@ip-lit.com
Stephen F. Schlather (admitted pro hac vice)
sschlather@ip-lit.com.com
EDMONDS & SCHLATHER, PLLC
1616 S. Voss Road, Suite 125
Houston, Texas 77057
Telephone: (713) 364-5291
Facsimile: (832) 415-2535

Andrew T. Oliver, (admitted pro hac vice)
AMIN, TUROCY & WATSON LLP
 160 W. Santa Clara St., Suite 975
 San Jose, CA 95113
 Telephone: (650) 393-0634
 Email: aoliver@atwiplaw.com

*Attorneys for Defendant
Atdec Distribution USA Pty. Limited*

*Attorneys for Plaintiff
Mass Engineered Design, Inc.*

SECOND STIPULATED MOTION AND [PROPOSED] ORDER GRANTING
EXTENSION OF TIME TO ANSWER OR RESPOND - 2
(No. 2:19-cv-00677-BJR)

102541185.1 0070171-00002

STOEL RIVES LLP
ATTORNEYS
600 University Street, Suite 3600, Seattle, WA 98101
Telephone 206.624.0900

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26

DATED: July 3, 2019.

Barbara Jacobs Rothstein
U.S. District Court Judge

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on June 28, 2019, I electronically filed the foregoing **SECOND**
3 **STIPULATED MOTION AND [PROPOSED] ORDER GRANTING EXTENSION OF**
4 **TIME TO ANSWER OR RESPOND** with the Clerk of Court using the CM/ECF system, which
5 will send notification of such filing to all parties appearing in this case:

6 John J. Edmonds
7 Stephen F. Schlather
8 EDMONDS & SCHLATHER PLLC
9 1616 S. Voss Road, Suite 125
10 Houston, TX 77057
11 jedmonds@ip-lit.com
12 sschlather@ip-lit.com

13 Nicholas R. Ranallo
14 RANALLO LAW OFFICE
15 5058 57th Ave. S.
16 Seattle, WA 98118
17 nick@ranallolawoffice.com

18 *Attorneys for Plaintiff*

19 Dated: June 28, 2019

20 /s/ Jenna M. Poligo
21 Jenna M. Poligo, WSBA No. 54466
22 STOEL RIVES LLP
23 600 University Street, Suite 3600
24 Seattle, WA 98101
25 Telephone: 206.624.0900
26 Facsimile: 206.386.7500
Email: jenna.poligo@stoel.com